



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**REGION 5**

**77 WEST JACKSON BOULEVARD**

**CHICAGO, IL 60604-3590**

**MAR 7 2011**

REPLY TO THE ATTENTION OF:

**AR-18J**

Michael E. Hopkins, P.E.  
Assistant Chief, Permitting  
Ohio EPA, Division of Air Pollution Control  
50 West Town Street, Suite 700  
P.O. Box 1049  
Columbus, Ohio 43216-1049

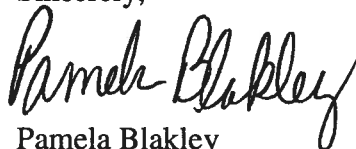
Dear Mr. Hopkins:

Thank you for the opportunity to comment on the draft Title V initial permit for Bellefontaine Gas Producers, LLC (facility ID 0546015002, permit number P0106059), located in Bellefontaine, Logan County, Ohio. The comments are as follows:

1. Additional Terms and Conditions (b) states "The BAT [Best Available Technology] requirements under OAC rule 3745-31-05(A)(3) do not apply to the SO<sub>2</sub>, VOC, and PM<sub>10</sub> emissions from this air contaminant source since the uncontrolled potential to emit for SO<sub>2</sub>, VOC, and PM<sub>10</sub> are each less than ten tons per year." Because there is currently no exemption from BAT in the Ohio State Implementation Plan (SIP) for emissions less than ten tons per year, this term should not be in the permit. Furthermore, this term contradicts the Additional Terms and Conditions (c), which correctly explains that BAT is still required by the SIP for emissions less than ten tons per year.
2. Please explain whether this facility processes landfill gas from landfills that accept construction and demolition waste. If the answer is yes, then there is a chance that the landfill gas contains hydrogen sulfide (H<sub>2</sub>S) in significant quantity. The draft permit does not contain an emissions limit for H<sub>2</sub>S.
3. New Source Performance Standards Subpart JJJJ contains emissions limits for NO<sub>x</sub>, CO, and VOC; however, the draft permit only includes a VOC limit from Subpart JJJJ. If NO<sub>x</sub> and CO limits from JJJJ are also applicable, they should also be included in the permit.

If you have any questions regarding these comments, please contact Kaushal Gupta of my staff at (312) 886-6803.

Sincerely,

A handwritten signature in black ink, appearing to read "Pamela Blakley". The signature is fluid and cursive, with the first name "Pamela" and last name "Blakley" clearly distinguishable.

Pamela Blakley  
Chief  
Air Permits Section